

UNITED STATES DISTRICT COURT

for the
Middle District of North Carolina

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)

TWO (2) DRIVES CONTAINING INFORMATION
ASSOCIATED WITH MEGA ACCOUNTS AND
HYPERLINK CONTENT

Case No. 1:24MJ439-1

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the Middle District of North Carolina, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. § 2252A(a)(2)(A)	Receipt/Distribution of Child Pornography
18 U.S.C. § 2252A(a)(5)(B)	Possession of/Access with Intent to View Child Pornography
18 U.S.C. § 2252A(a)(1)	Transportation of Child Pornography

The application is based on these facts:

See Affidavit

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/s/ Garrett L. Foo

Applicant's signature

Garrett L. Foo, Special Agent FBI

Printed name and title

On this day, the applicant appeared before me via reliable electronic means, that is by telephone, was placed under oath, and attested to the contents of this Application for a search warrant in accordance with the requirements of Fed. R. Crim. P. 4.1.

Date: 11/8/2024 3:54 PM


Judge's signature

City and state: Durham, North Carolina

Joe L. Webster, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

IN THE MATTER OF THE SEARCH OF
TWO DRIVES CONTAINING
INFORMATION ASSOCIATED WITH
MEGA ACCOUNTS AND HYPERLINKS

Case No. 1:24MJ439-1

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Special Agent Garrett L. Foo, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I make this affidavit in support of an application for an anticipatory search warrant under Federal Rule of Criminal Procedure 41(b)(1), to search for and seize contraband, evidence, fruits, and/or instrumentalities of violations of Title 18 U.S.C. § 2252A(a)(2)(A) Receipt/Distribution of Child Pornography, Title 18 U.S.C. § 2252A(a)(1) Transportation of Child Pornography, and Title 18 U.S.C. § 2252A(a)(5)(B) Possession of/Access with Intent to View Child Pornography. Specifically, I seek authorization to search the electronic storage medium identified in Attachment A for the items set forth in Attachment B of this affidavit.

2. I am investigating Oran Alexander Routh for child exploitation offenses. As described below, a Federal Bureau of Investigation (FBI) employee in New Zealand has received information associated with MEGA accounts and links relevant to my investigation. The employee is mailing the information to me at the FBI office in the Middle District of North Carolina on two (2) SanDisk Flash Drives (Subject Drives).

3. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe

that violations of Title 18 U.S.C. § 2252A(a)(2)(A) Receipt/Distribution of Child Pornography, Title 18 U.S.C. § 2252A(a)(1) Transportation of Child Pornography, and Title 18 U.S.C. § 2252A(a)(5)(B) Possession of/Access with Intent to View Child Pornography have been committed by MEGA users, including Routh. There is probable cause to search the information described in Attachment A for evidence, instrumentalities, contraband, and/or fruits of these crimes as further described in Attachment B.

4. I am a Special Agent with the Federal Bureau of Investigation (FBI), assigned to the FBI's Charlotte Field Office, Greensboro Resident Agency. My responsibilities include enforcing federal laws as set forth in the United States Code (U.S.C.), including violations of Title 18 U.S.C. § 2252A(a)(2)(A) Receipt/Distribution of Child Pornography, Title 18 U.S.C. § 2252A(a)(1) Transportation of Child Pornography, and Title 18 U.S.C. § 2252A(a)(5)(B) Possession of/Access with Intent to View Child Pornography. Prior to joining the FBI, I was employed as a securities fraud investigator for the State Corporation Commission of Virginia for over five years. Since becoming a Special Agent, I have received extensive training related to criminal investigations. I have completed the FBI's Crimes Against Children Basics Investigations Course in Linthicum, Maryland, which is a training for techniques and practices for investigations related to child exploitation and child exploitation imagery. I have worked as a liaison with local, state, and federal law enforcement authorities regarding investigations and emerging threats related to the exploitation of children. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2252A(a)(2)(A) and 2252A(a)(5)(B), and I am authorized by law to request a search warrant.

BACKGROUND ON MEGA

5. Based on my training and experience, I have learned that MEGA is a company that provides several products, including cloud storage. MEGA offers its cloud storage service through a website and an application that can be downloaded to devices. MEGA is headquartered at Level 21, Huawei Centre, 120 Albert Street, Auckland, New Zealand. On information and belief, MEGA's computer servers are located in New Zealand, and MEGA does not have offices or employees in the United States.

6. A MEGA user can sign up for an account with a valid email address, which becomes the user's MEGA username. MEGA provides users with a certain amount of free data storage. If a user wants more storage, the user can pay for it. Users can access MEGA through the Internet from most major devices and platforms. MEGA enables users to store files on remote servers and sync files across their devices. Users can share links, either public or password protected, to content with others and invite others to upload content. MEGA advertises that a user's data is encrypted and decrypted by the user's device only and never by MEGA.

7. MEGA keeps "basic subscriber information" (BSI) for accounts that includes the following:

userhandle	The user handle is a unique identifier associated with a MEGA account.
email	The current email address associated with the MEGA account.
firstname	The first name provided by the user.
lastname	The last name provided by the user.
MSISDN	The phone number supplied by the user.
status	For example, active or suspended.

creation_timestamp	The UTC timestamp when the first login session started.
lastactive_timestamp	The most recent UTC timestamp from all of the user's sessions.
signup_country	The country the user signed up from, as inferred from IP address using the Maxmind Database of IP addresses.
mfa_enabled	Whether two-factor authentication for account sign-in has been enabled.
pro_level	Indicates whether the user has a free or paid account and, if paid, the level.
active_public_links	The number of file/folder links the user has created and hasn't yet deleted.
copyright_takedowns	The number of links created by the user that have been taken down in response to reports of copyright infringement.
public_upload_pages	List of file request links that the user has created and their status. Users can generate file requests to receive and collect files from anyone, including people who don't have a MEGA account.
inshares	List of the folders that other MEGA users have shared with this user. Details include the folder handle for a folder shared with this user by others, the owner of the shared folder, the date the folder was shared with this user, and the time the share was removed.
outshares	List of the folders the user has shared with other users. Details include the folder handle for a folder shared by this user with other MEGA users, the user email address that an outshare is directed to, the date the folder has been shared by this user, and the time the share was removed.
contacts	List of the user's contacts in MEGA. Details include the contact email address, if they are still contacts, if they used to be contacts, and the date/time when the contact was established. MEGA also retains information about the user's contact requests, including the contact email and whether the request was accepted.
num_chats	The number of private or public chats the user has been involved with.
storage	The number of bytes, files and folders currently present in the account.

Links	List of handles for public folder/file links created by the user. Details include creation timestamp, handle, and status.
payments	List of payments made by the user.
password_changes	List showing the timestamp and the IP from where the user changed their password.
parked_accounts	List of accounts with the same email address as the current one that have been parked or deleted.
related_accounts	List of accounts associated with the user account.
email_changes	History of the email addresses that have been associated with the user account.
session_details	Basic session information such as IP address, web browser, and operating system.
mega_support_notes	Internal notes made by MEGA employees. May show that MEGA removed some objectionable content from the account such as child exploitation material.

PROBABLE CAUSE

8. On September 21, 2024, the FBI searched Oran Alexander Routh's residence in Greensboro, North Carolina, his vehicle, and his person in connection with an investigation unrelated to child exploitation. Investigators seized multiple electronic devices. Routh was arrested and released for possession of controlled substance offenses. While processing a device (Device-1) seized from Routh's bedroom, investigators observed child pornography. On September 22, 2024, I obtained a warrant to search devices seized from Routh's person and his bedroom for child exploitation material.

9. Routh's residence is a second floor two-bedroom and two-bathroom dwelling. The rental contract for the residence lists Routh as the sole occupant and was signed in early August of 2024. On September 22, 2024, the residence's property manager advised that Routh was the only

person who applied to reside at the residence and was the only person known to live there. Routh's prior residence was also in Guilford County and his license lists a Guilford County address.

10. Items observed within the primary bedroom of Routh's residence identify it as his room. In the room were several prescription medicine bottles in Routh's name and "Oran" was written on a Starbucks bag on a bedside dresser. Investigators recovered multiple electronic devices from the room, including a Samsung Galaxy Note 9 in a laptop bag (Device-1). When powered on, a message appears on Device-1 offering a reward if it is returned to its owner. The email address orouth@gmail.com is provided as a contact in the message.

11. A review of the SD card located in Device-1 revealed that it contains hundreds of child pornography files. These files include videos from a known child pornography series created outside the state of North Carolina. Videos from the series depict minors engaged in sex acts including a video of an adult male engaging in oral, vaginal, and anal sex with a prepubescent female minor approximately 8-10 years of age. Further, several videos depicting child pornography contained file paths known to be associated with the MEGA application. On the SD card, I also located a phone screen capture of seven MEGA hyperlinks. An FBI employee located in New Zealand viewed the content at four of the links and observed that the links contained numerous child pornography files. The four links were public links. They have now been disabled. The remaining three links were encrypted and not accessible. According to information provided by New Zealand authorities, the links were all created by the same MEGA user (Subject-1).

12. Investigators also recovered a Samsung Galaxy Note 9 from Routh's person (Device-2). A preliminary review of Device-2 also revealed child pornography and the MEGA application on the device. In a folder titled "Download," investigators observed a video depicting an adult female engaging in oral sex with a prepubescent minor female between approximately 6-

8 years of age. Investigators also located chats from Kik, a messenger application that, based on my training and experience, is commonly used by individuals who distribute and receive child pornography. In a July 2024 Kik chat, Kik User-1 advertised MEGA cloud storage links for sale. The user of Device-2, Kik user Jondoe9269 (jondoe9269_nf8@talk.kik.com), asked for a preview of the content. On July 23, 2024, Kik User-1 sent the user of Device-2, Kik user Jondoe9269, the following files:

- a. A video depicting an adult male engaged in vaginal intercourse with a prepubescent minor female between approximately 12-14 years of age.
- b. A video depicting a nude prepubescent minor female between approximately 6-8 years of age sitting on the chest of an adult female as the adult uses her tongue to penetrate the minor's vagina.
- c. A video depicting two nude minor females. One child is a pubescent minor female, approximately 12-14 years of age. The other child is a prepubescent minor female, approximately 8-10 years of age. The minors begin to touch each other's breasts and kiss.

After receiving the above referenced files, Kik user Jondoe9269 and Kik User-1 discussed the amount of content contained in the MEGA link, the price for the link, and the means of payment for the content.

13. During the September 21, 2024, search of Routh's residence, a third Samsung Galaxy Note 9 was recovered from Routh's bedroom in a nightstand (Device-3). A review of Device-3 revealed the Whisper application, an anonymous social media platform with direct messaging capabilities. A Whisper chat between the user of Device-3 and Whisper User-1 occurred on January 18, 2022:

User of Device-3: Mmm, oh really now...I'd love to see for myself...

Whisper User-1: My son and I make content together he's 5 and I'm 26. He pleasures me in many ways. We charge \$40 for our content over 100 gigs on mega. I have wickr. I take cashapp and PayPal.

User of Device-3: Hmu [hit me up] on wickr,[redacted Wickr username] on there

Whisper User-1: [redacted Wickr username]

Wickr is an end-to-end encrypted application which allows users to send content-expiring messages, including photos, videos, and file attachments, in one-to-one or group chats. Investigators observed two additional Whisper chats from 2022 in which the user of Device-3 was apparently offered child pornography for purchase via MEGA.

14. During the September 21, 2024 search of Routh's residence, a fourth Samsung Galaxy Note 9 was recovered from Routh's bedroom under a pillow, on his bed (Device-4). Device-4 contained child pornography. It also contained a screen capture of MEGA's registration page in which the email address vehajom394@vingood.com was entered with the name "John Doe."

15. Samsung Galaxy Note 9 devices are labeled "Manufactured in Korea."

16. Synchronnos Technologies is the cloud-based storage provider for content stored on the Verizon Cloud. Verizon Cloud offers secure online storage to backup and sync contacts, photos, videos, music, documents, call logs, and text messages from Android mobile devices. In June 2023, Synchronnos Technologies made a Cyber Tipline Report to the National Center for Missing and Exploited Children (NCMEC) regarding a child pornography video associated with Routh's account. The video depicted an adult performing oral sex on what appears to be a pubescent minor female. In October 2023, pursuant to a warrant, the Guilford County Sheriff's

Office obtained data associated with the account. The return consisted of thousands of images, but none constituted child pornography.

17. Routh was arrested for child exploitation offenses on September 23, 2024, and released on home incarceration on October 2, 2024.

18. During my review of Device-2, I observed that the following email addresses were associated with various applications on the device: orouth@gmail.com, vikingrigging2020@gmail.com, myjunkmailetc@yahoo.com, myjunkmailetc@yahoo.com.

19. During the review of a laptop recovered from Routh's bedroom nightstand (Device-5), I observed that myjunkmailetc@yahoo.com was saved to an Internet browser on the laptop as a MEGA username.

20. In October 2024, I requested that New Zealand authorities obtain from MEGA the content of the seven above-described MEGA hyperlinks and information for any accounts associated with: orouth@gmail.com, vikingrigging2020@gmail.com, myjunkmailetc@yahoo.com, myjunkmailetc@yahoo.com, and vehajom394@vingood.com. New Zealand authorities provided an FBI employee in New Zealand with responsive information, including MEGA BSI report(s), information about Subject-1's account, and the content of the four accessible links. The employee is mailing the information to me at the FBI office in the Middle District of North Carolina on two (2) SanDisk Flash Drives (Subject Drives).

TERMINOLOGY

21. Based on my knowledge, training, and experience, I use the following terms to convey the following meanings:

a. "Child pornography", as defined in 18 U.S.C § 2256(8), is any visual depiction, including any photograph, film, video, picture, or computer or computer-generated

image or picture, whether made or produced by electronic, mechanical or other means, of sexually explicit conduct, where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital images, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct.

b. “Minor,” as defined in 18 U.S.C § 2256(1), means any person under the age of eighteen years old.

c. “Sexually explicit conduct,” as defined in 18 U.S.C. § 2256(2), means actual or stimulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the anus, genitals, or pubic area of any person.

d. “Visual depiction,” as defined 18 U.S.C. § 2256(5), includes undeveloped film and videotape, data stored on computer disc or other electronic means which is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.

e. “Child erotica” means any materials or items that are sexually arousing to persons having a sexual interest in minors but that are not necessarily obscene or do not necessarily depict minors engaging in sexually explicit conduct.

f. “Computer” refers to “an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with

such device” and includes smartphones, other mobile phones, and other mobile devices. See 18 U.S.C. § 1030(e)(1).

g. The “Internet” is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

CONDITION REQUIRED PRIOR TO EXECUTION

22. I am seeking permission to search the Subject Drives that will be sent to me from an FBI employee in New Zealand once the drive arrives at the FBI office in Greensboro, North Carolina.

23. Because this warrant seeks permission only to examine information on computer media in law enforcement’s possession, the execution of this warrant does not involve the physical intrusion onto a premises. Consequently, I submit there is reasonable cause for the Court to authorize execution of the warrant at any time in the day or night.

CONCLUSION

24. Based on the information described above, I respectfully submit there is probable cause to believe that contraband, evidence, fruits, and/or instrumentalities of violations of Title 18 U.S.C. § 2252A(a)(2)(A) Receipt/Distribution of Child Pornography, Title 18 U.S.C. § 2252A(a)(1) Transportation of Child Pornography, and Title 18 U.S.C. § 2252A(a)(5)(B) Possession of/Access with Intent to View Child Pornography the Subject Offenses are currently located on the Subject Drives that will be in the Middle District of North Carolina at the time the warrant is executed.

Respectfully submitted,

/s/ Garrett L. Foo

Garett L. Foo
Special Agent
Federal Bureau of Investigation

Pursuant to Rule 4.1 of the Federal Rules of Criminal Procedure, the affiant appeared before me via reliable electronic means (telephone), was placed under oath, and attested to the contents of the written affidavit.

Subscribed and sworn to before me on November 8, 2024 3:54 pm:



JOE L. WEBSTER
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Property to Be Searched

Two (2) SanDisk Flash Drives in the possession of the Federal Bureau of Investigation,
located in the Middle District of North Carolina.

ATTACHMENT B

Particular Things to be Seized

All information that constitutes fruits, contraband, evidence, and instrumentalities of violations of Title 18 U.S.C. § 2252A(a)(2)(A) Receipt/Distribution of Child Pornography, Title 18 U.S.C. § 2252A(a)(1) Transportation of Child Pornography, and Title 18 U.S.C. § 2252A(a)(5)(B) Possession of/Access with Intent to View Child Pornography in the form of the following:

- a. child pornography, as defined in 18 U.S.C. 2256(8), and its source;
- b. child erotica and its source;
- c. records and information referencing or revealing child pornography or child erotica;
- d. records and information referencing or revealing the trafficking, advertising, or possession of child pornography, to include the identity of the individuals involved and location of occurrence;
- e. records and information referencing or revealing interaction with MEGA links that may contain child pornography, including the creation, sharing, and content of the links;
- f. records and information referencing or revealing a sexual interest in children or the sexual exploitation of children, to include the identity of the individuals involved and location of occurrence;
- g. records and information referencing or revealing communication or interaction of an illicit sexual nature with minors, to include the identity of the individuals involved and location of occurrence;

h. records and information referencing or revealing participation in groups or the use of services that are known to be used to facilitate the trafficking of child pornography; and

i. evidence of user attribution showing who used or owned the relevant account at the time the things described in this warrant were created, edited, or deleted.